



Miedel & Mysliwiec LLP

March 17, 2020

Hon. Katherine Polk Failla  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Clifford Taylor, 19-CR-410**

Dear Judge Failla:

On Monday, March 16, 2020, I filed a motion on behalf of Mr. Taylor seeking his temporary release on bail given the fact that he falls in the highest risk category of becoming gravely ill or dying if he contracts COVID-19. Since then, there have been further developments on this front across the country, as explained in two articles from today, one in New York Magazine, available at <https://nymag.com/intelligencer/2020/03/will-rikers-island-free-inmates-because-of-coronavirus.html>, and one in the Washington Post, available at <https://www.washingtonpost.com/opinions/2020/03/17/we-must-release-prisoners-lessen-spread-coronavirus/>. The article in New York Magazine references an announcement by the New York City Board of Correction, an independent oversight board for the City's jail system, which calls for the immediate release of high-risk inmates from New York City's jails. *See* Board of Correction Announcement, Exhibit C.

Thank you for your consideration.

Respectfully,

/s/

Florian Miedel  
*Attorney for Clifford Taylor*

cc: AUSA Daniel Wolf